## DAWN M. FLORIO LAW FIRM, PLLC

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## MEMO ENDORSED

July 19, 2022

VIA ECF

Honorable Edgardo Ramos United States District Judge Thurgood Marshall United State Courthouse 40 Foley Square New York, New York 10007

RE: *United States v. Thomas Santos* 1:20-CR-00481-ER-1

Honorable Ramos;

I, Dawn M. Florio, attorney at law, represent Thomas Santos on the above case matter. I was contacted by Mr. Santos that he is getting married on July 21 @ 1030am by the Manhattan City Clerk's Office. Mr. Santos is asking if he can check into the Margaritaville Resort Times Square located at 560 7th Avenue, New York, NY at 3pm on July 20, 2022, to get ready to then head to Maestro Restaurant at 8pm located at 1285 6th Avenue, New York, NY to celebrate their upcoming nuptials with family and close friends. Once they are done, head back to the Hotel to then check out the very next day on the 21st to head to the clerk's office to get married. Mr. Santos curfew is 7pm and as per Pre-trial Services office policy they cannot consent to the travel/overnight request when a defendant is subject to a curfew enforced by location monitoring.

I have spoken to AUSA Jarrod Schaeffer, and he defers to Pretrial in this matter as well as USPO Marlon Ovalles only granting this request if the court allows it for this one evening. I am requesting that this application be acknowledged and considered and apologize for the last-minute submission.

Should your Honor have any questions or concerns, please feel free to contact my office at your earliest convenience.

The application for a temporary modification of bail is GRANTED.

SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: 7/20/2022

New York, New York

CC: All Counsel

Sincerely,

Dawn M. Florio

Dawn M. Florio, Esq. *Attorney for Thomas Santos*